

FILED

APR - 7 2021

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESSE E. VARGAS,

Defendant.

4:21CR240 RLW/DDN

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

Between on or about January 1, 2013 and December 31, 2013, in St. Louis County, Missouri within the Eastern District of Missouri and elsewhere,

**JESSE E. VARGAS,**

the defendant herein, did knowingly travel in interstate commerce, between New York and Missouri, for the purpose of crossing one or more State lines to engage in a sexual act with a person under 16 years of age, at a time that the defendant was at least 4 years older than such person, in violation of Title 18, United States Code, Section 2423(b).

**COUNT II**

The Grand Jury further charges that:

Between on or about January 1, 2013 and December 31, 2013, in the Eastern District of Missouri, and elsewhere,

**JESSE A. VARGAS,**

the defendant herein, did knowingly persuade, induce, entice and coerce use any facility or means of interstate or foreign commerce, to knowingly persuade, induce, entice and coerce a person under 16 years of age to travel in interstate commerce between New York and Missouri for the purpose of engage in sexual activity for which any person can be charged with a criminal offense, to wit acts of statutory rape and statutory sodomy, in violation of Title 18, United States Code, Section 2422(b).

A TRUE BILL.

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FOREPERSON

JEFFREY B JENSEN  
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